

1 JOHN P. ALDRICH
Nevada Bar No. 6877
2 **ALDRICH LAW FIRM, LTD.**
7866 West Sahara Avenue
3 Las Vegas, Nevada 89117
Telephone: (702) 853-5490
4 Facsimile: (702) 227-1975
Email: jaldrich@johnaldrichlawfirm.com

5 Kara M. Wolke (*pro hac vice pending*)
6 Leanne H. Solish (*pro hac vice pending*)
Raymond D. Sulentic (*pro hac vice pending*)
7 **GLANCY PRONGAY & MURRAY LLP**
1925 Century Park East, Suite 2100
8 Los Angeles, California 90067
9 Telephone: (310) 201-9150
Facsimile: (310) 201-9160
10 Email: kwolke@glancylaw.com

11 *Lead Counsel for Lead Plaintiff Denis Bourque*

12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 MARC BERNSTEIN, Individually and On
Behalf of All Others Similarly Situated,
15 Plaintiff,

16 v.

17 MP MATERIALS CORP. f/k/a FORTRESS
18 VALUE ACQUISITION CORP., JAMES H.
LITINSKY, RYAN CORBETT, ANDREW A.
19 MCKNIGHT, and DANIEL N. BASS,

20 Defendants.
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Case No. 2:22-cv-00315-CDS-DJA

The Hon. Cristina D. Silva

**LEAD PLAINTIFF DENIS BOURQUE'S
NOTICE OF VOLUNTARY DISMISSAL**

1 NOTICE IS HEREBY GIVEN that, pursuant to Federal Rule of Civil Procedure
2 41(a)(1)(A)(i), Lead Plaintiff Denis Bourque (“Plaintiff”) hereby voluntarily dismisses this action,
3 without prejudice, as to all Defendants (MP Materials Corp. *f/k/a* Fortress Value Acquisition Corp.,
4 James H. Litinsky, Ryan Corbett, Andrew A. Mcknight, and Daniel N. Bass), and without prejudice
5 to his ability to participate in related actions as an absent class member. As grounds therefore,
6 Plaintiff states that: (1) no opposing party has served either an answer or a motion for summary
7 judgment; and (2) this dismissal will not bind or prejudice any party or member of the putative class.

8
9 Dated: August 24, 2022

10 **ALDRICH LAW FIRM, LTD.**

11 /s/ John P. Aldrich

12 John P. Aldrich

13 Nevada Bar No. 6877

14 7866 West Sahara Avenue

15 Las Vegas, Nevada 89117

16 Telephone: (702) 853-5490

17 Facsimile: (702) 227-1975

18 Email: jaldrich@johnaldrichlawfirm.com

19 *Liaison Counsel for Lead Plaintiff Denis Bourque*

20 **GLANCY PRONGAY & MURRAY LLP**

21 Kara M. Wolke (*pro hac vice pending*)

22 Leanne H. Solish (*pro hac vice pending*)

23 Raymond D. Sulentic (*pro hac vice pending*)

24 1925 Century Park East, Suite 2100

25 Los Angeles, California 90067

26 Telephone: (310) 201-9150

27 Facsimile: (310) 201-9160

28 Email: clinehan@glancylaw.com

Lead Counsel for Lead Plaintiff Denis Bourque

THE LAW OFFICES OF FRANK R. CRUZ

Frank R. Cruz

1999 Avenue of the Stars, Suite 1100

Los Angeles, CA 90067

Telephone: (310) 914-5007

Additional Counsel

PROOF OF SERVICE BY ELECTRONIC POSTING

I, the undersigned say:

I am not a party to the above case, and am over eighteen years old. On August 22, 2022 I served true and correct copies of the foregoing document by posting the document electronically to the ECF website of the United States District Court for the District of Nevada, for receipt electronically by the parties listed on the Court's Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on August 24, 2022 at Las Vegas, Nevada.